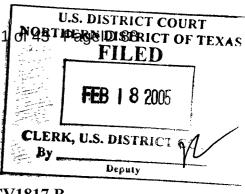
Case 3:04-cv-01817-B Document 16 Filed 02/18/05 Page 1

ORIGINAL

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION



BRIAN HARENESS D/B/A	§	Deputy
BRIAN HARNESS PHOTOGRAPHY,	§	NO. 304CV1817 B
Plaintiff,	§	
v.	§	
	§	ORIGINAL COMPLAINT:
JOHN J. WILSON,	§	
INTERVEST-BRADFORD IV, LTD.	§	COPYRIGHT INFRINGEMENT
INTERVEST-CENTURION, LLC.,	§	
BRADFORD HOMESUITES	§	
DEVELOPMENT, LTD. and	§	
INTERVEST-BRADFORD, LTD.,	§	
Defendants.	§	JURY DEMANDED

PLAINTIFF'S FIRST AMENDED COMPLAINT

1. Plaintiff, Brian Harness d/b/a Brian Harness Photography ("Harness" or "Plaintiff"), for his first amended complaint against Defendants, John J. Wilson ("Wilson"), Intervest-Bradford IV, Ltd. ("IB4"), Intervest-Centurion, LLC. ("Centurion"), Bradford Homesuites Development, LTD. ("Development"), and Intervest-Bradford, LTD. ("IBLTD"), and Vantis USA, Inc. ("Vantis") and collectively called "Defendants," alleges:

JURISDICTION/VENUE

- 2. This claim arises under the copyright laws of the United States, 17 U.S.C. 101 *et. seq.*, (hereinafter the Copyright Act.).
- 3. Subject matter and personal jurisdiction is vested in this Court pursuant to 28 U.S.C. 1338. Additionally, this Court has subject matter jurisdiction under 28 U.S.C. 1331 inasmuch as this claim arises under the copyright laws of the United States. Venue in this judicial district is proper pursuant to 28 U.S.C. 1400(a) and 28 U.S.C. 1391(b) and (c).

THE PARTIES

- 4. Plaintiff, is an individual citizen of Texas engaged in the business of professional photography, and who resides and has a principal place of business in Dallas, Dallas County, Texas
- 5. **Wilson** is an individual residing in Dallas County, Texas, and has been served and has answered, and no further service is needed.
- 6. **IB4** is a Texas limited partnership in the business of establishing or operating hotels in and around Dallas, Texas. It has been served and has answered, and no further service is needed.
- 7. **Centurion** is a Texas limited liability company in the business of establishing or operating hotels in and around Dallas, Texas. It has been served and has answered, and no further service is needed.
- 8. **Development** is a Texas limited partnership in the business of establishing or operating hotels in and around Dallas, Texas. It has been served and has answered, and no further service is needed.
- 9. **IBLTD** is a Texas limited partnership in the business of establishing or operating hotels in and around Dallas, Texas. It has been served and has answered, and no further service is needed.
- 10. **Vantis** is a Nevada corporation, licensed and doing business in Texas, and will receive actual notice of the filing of this Original Complaint through service upon its registered agent, June Pape, 2120 Walnut Hill Lane, Suite 100, Irving, Texas 75038.

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INTRODUCTORY FACTS

- 11. Harness is a professional photographer, and is the author (photographer) of, and at all times relevant to this claim, has been and is now the sole owner and proprietor of all right, title and interest in and to the copyrights in certain collections of photographs known as "Photographs 2000 Vol. 1" One photograph within this collection was originally created by Plaintiff for advertising use by the architect of the structure (Exhibit 1).
- 12. Harness has complied in all respects with Title 17 of the United States Code (Copyright Act of 1976) and all other United States laws governing copyrights, and has secured the exclusive rights and privileges in and to the copyrights to the above-described photographs.
- 13. Harness owns certain rights in and to Copyright Registration Number VAu 492-275 issued by the U. S. Registrar of Copyrights in Washington, D.C. for photographs within said collection of images deposited with and covered by said registration (Exhibit 2).
- 14. Harness's copyrights in the above-described work is presently valid and subsisting, and was valid and subsisting from the moment of its creation in the year 2000, and all conditions precedent to the filing of this suit have occurred.

INFRINGEMENT FACTS

15. On or about October 5, 2000, Harness delivered three print copies each of two images to Defendants. The license authorized the prints to be used for display purposes, in accordance with the verbal desires of Wilson to hang them on the walls of his offices. The agreement and license is attached hereto as **Exhibit 2A**.

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- 16. On or about August 20, 2003, Harness became aware that Defendants had, without authorization, made one of his images accessible to many Internet travel websites, advertising the availability of their hotel rooms for rent (Exhibit 3, listing of URLs).
- 17. Plaintiff hired an attorney, who, on January 30, 2004, demanded that Defendants cease and desist from their use of Harness' copyrighted image (Exhibit 4). Defendants however, failed or refused to do so, and Harness was forced to demand that dozens of Internet hotel reservation websites cease and desist pursuant to the Digital Millenium Copyright Act (Exhibit 5, sample letter).
- 18. Based on documents provided by Wilson and the Intervest-Bradford entities, it appears that the entity that caused Plaintiff's copyrighted image to be available for viewing on hundreds of internet hotel reservation web sites was Vantis USA, Inc. Because Vantis profited each time a reservation was placed using Plaintiff's image, it is therefore a joint or contributory infringer.

CAUSES OF ACTION

19. Thus, for many months, and without Plaintiff's authorization, Defendants have willfully infringed Plaintiff's copyrights in and to the above-described image by publishing and/or otherwise using, and/or by scanning, copying, and/or reproducing, or allowing unauthorized copies of said photograph to be displayed within and without the United States.

CAUSATION/DAMAGES

20. As a direct and proximate result of Defendants' above-described acts of copyright infringement, Harness has sustained actual damages in an amount not yet ascertained, but which is believed to be in excess of \$100,000. Such actual damages include, but are not limited to, lost profits and/or lost licensing revenue, research time tracking down and documenting the infringements, and attorney time spent placing joint infringers on notice of the infringements under the DMCA, and getting the image removed from many dozens of servers and web sites.

RELIEF REQUESTED

- 21. Harness demands an accounting by Defendants of their activities in connection with their infringements of his copyrights in and to the above-described and attached photograph, as well as their gross profits and income derived therefrom.
- 22. Harness is entitled to and seeks to recover actual damages plus the profits of Defendants attributable to the infringements.
- 23. Alternative to actual damages and profits attributable to the infringements, because the image was registered prior to Defendants' infringements, Harness is entitled to and seeks to recover statutory damages up to but not exceeding \$150,000 (One Hundred Fifty Thousand Dollars), plus reasonable and necessary attorneys fees.

HARNESS DEMANDS JUDGMENT AS FOLLOWS

24. Defendants, their agents, employees and/or servants be enjoined *pendente lite* and permanently from infringing Harness' copyright in any manner whatsoever, and from publishing through any visual media, and from selling, marketing or otherwise distributing any of his

images;

- 25. That Defendants be required to deliver up, under oath, for impounding during the pendency of this action, and for destruction thereafter, *all images* which infringe Harness' copyrights, and all prints, film negatives, magnetic tapes, digitally scanned and/or stored images, and all other articles by means of which such infringing copies may be reproduced, which are in the possession or under the direct or indirect control of Defendants;
- 26. That Defendants be required to pay over to Harness his actual damages sustained, in addition to all their profits attributable to the infringements, and which are not taken into account in computing Harness' actual damages incurred as a result of Defendants' copyright infringements described herein;
- 27. That Defendants provide an accounting of all gains, profits and advantages derived by them as a result of the willful and unlawful acts of copyright infringement above-described;
- 28. That Defendants pay to Harness his costs and attorney's fees; and
- 29. That Harness have such other and further relief as this court shall deem just and proper.

Plaintiff, Brian Harness d/b/a Brian Harness Photography, demands a jury trial on all issues except the amount of his attorney's fees that are recoverable.

Respectively submitted,

By:

DANA LEJUNE TBA #12188250 3006 BRAZOS STREET Houston, Texas 77006

713/942-9898

713/942-9899 Facsimile

ATTORNEY FOR PLAINTIFF,

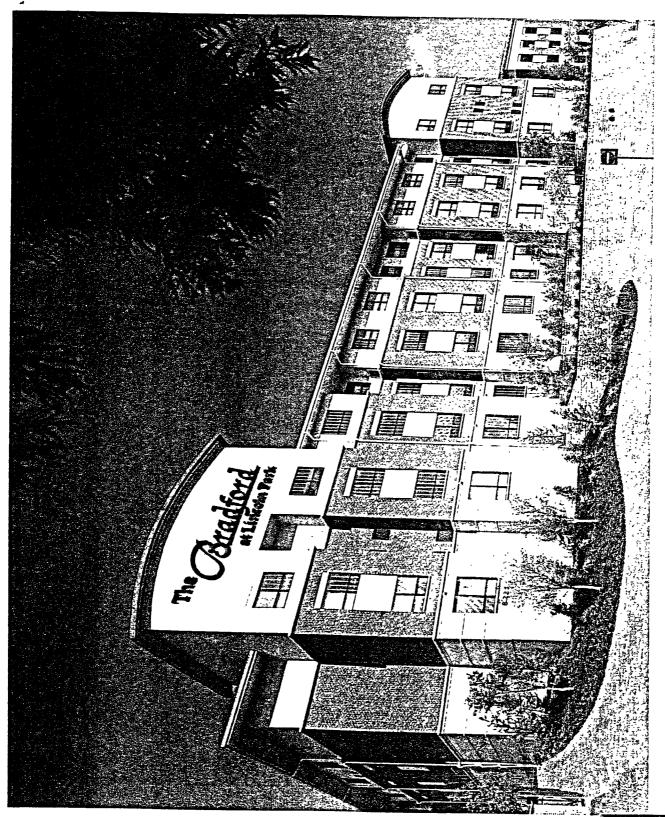
BRIAN HARNESS D/B/A

BRIAN HARNESS PHOTOGRAPHY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all interested parties on this the 16th day of February, 2005.

Dana A. LeJune





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PLAINTIFF'S EXHIBIT

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http://res.cheaptickets.com/servlet/reservations.PropertyInformationXML/VE_SCB009/cpt 4 (2x)

http://res.cheaptickets.com/servlet/reservations.CitywideAvailabilityXML?country=US&gar ea=Dallas%20Ft%20Worth&smokingpref=&inyear=2003&numrooms=1&inday=16&subm it=Check%20Availability&namepref=bradford&es=&outyear=2003&outday=17&remote=c pt4&state=TX&chainpref=&inmonth=10&city=Dallas&outmonth=10&numadults=2&bedpre f=

http://res.cheaptickets.com/servlet/reservations.CitywideAvailabilityXML?properror=0&re mote=cpt4&propcode=VE%3BSCB009&inmonth=10&numadults=2&mastercode=cpt&ou tday=17&inyear=2003&fromcw=yes&numrooms=1&outyear=2003&outmonth=10&inday=16&garea=Dallas+Ft+Worth&city=Dallas&state=TX&country=US&

http://res.cheaptickets.com/servlet/reservations.AvailabilityXML?propcode+VE;SCB009&remote=cpt4&mastercode+cpt&inmonth=10&inday (2x) (Partial URL)

http://reservations.cheaptripsnetwork.com/hotel/10007064-11241971O.html

http://reservations.cheaptripsnetwork.com/hotel/10007064-11241971O.html?ses=8b837ef7182f11fa582f790c40d4fe9c61885

ttp://reservations.cheaptripsnetwork.com/hotel/10007064-11241971O.html?ses=8b837ef7182f11fa582f790c40d4fe9c61885

ttp://reservations.cheaptripsnetwork.com/hotel/10007064-11241971O.html?ses=8b837ef7182f11fa582f790c40d4fe9c61885

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ttp://reservations.cheaptripsnetwork.com/hotel/10007064-11241971O.html?ses=8b837ef7182f11fa582f790c40d4fe9c61885

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http://book.cityaccommodation.com/index.jsp?pageName=hotInfo&cid=56554&hoteIID=170890&validat eCity=true&submitted=true (2x)

http://cityindex.com/detailstravel/1048250285.html

http://cssvc.res.travelocity.compuserve.com/hotel/HotelAvailability.do;jsessionid=3037D96 277B582AEA0587C8A5E954F22.p0318?SEQ=1107737442865162005

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http://cssvc.travel.compuserve.com/travel/air/aironly.jsp

http://cssvc.travelocity.compuserve.com/hotscobrand.ctl?Source=03&SEQ=91501985572 2473

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locator.com/servlet/reservations.PropertyInformationXML/VE_SCB009/locate-dal (2x)

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http://dallas-hotels-usa.com/The_Bradford_at_Lincoln_Park-hotel.com

http://reservations.dallas-texas-hotels-1.com/hotel/10006976-11241971O.html

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http://save.discounttravel.com/index.jsp?pageName=hotAvail&cid=49157&isHotels=true&isCondos=false&hotelID=170890&showPopUp=true

http://save.discounttravel.com/index.jsp?pageName=hotInfo&cid=49157&streetAddress=&city=Dallas&stateProvince=Tx&postalCode=75225&country=Us&numberOfAdults=2&numberOfChildren=0&numberOfRooms=1&mode=2&showPopUpMap=false&arrivalMonth=8&arrivalDay=30&departureMonth=9&departureDay=2&destinationID=9ec71f54-3dbc-4901-8c8a-9c9c85f5d42d&hoteIID=170890&hotelName=Bradford+At+Lincoln+Park

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lodging.com/servlet/reservations.PropertyInformationXML/VE_SCB009/dalguide (2x)

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http://save.discounttravel.com/index.jsp?pageName=hotInfo&cid=49157&hoteIID=170890 &isHRN=false&hotnetrates=true&pageNumber=0mode=2&streetAddress=&city=Dallas& stateProvince=Tx&postalCode=&country=Us&numberOfAdults=2&numberOfChildren=0& numberOfRooms=1&mode=2&showPopUpMap=false&arrivalMonth=8&arrivalDay=30&d epartureMonth=9&departureDay=2&destinationID=9ec71f54-3dbc-4901-8c8a-9c9c85f5d42d&landmarkDestinationID=Please%20select...&hotelName=Bradford+Lincol n+Park (2x)

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http://www.expedia.ca/pub/agent.dll?qscr=dspv&flag=l&itid=&itdx=&itty=&from=f (2x)

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http://www.expedia.com/pub/agent.dll?flag=q&qscr=dspv&hwrq=EX01B46621FFJGDC%24C8%24

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http://www.expedia.com/pub/agent.dll?flag=q&qscr=dspv&hwrq=EX01B46621FFJGDC% 24C8%2429uz%245Fkuz1%2170K%24B82%21H0% (Partial URL)

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http://reservations.findlocalpages.com/nexres/search/power_results.cgi?src=10004999&clear_cache=Y&lang=DCH&city=dallas&state=TX&country=&zip=&avail=Y&doa_mm=09&doa_dd=17&dod_mm=09&dod_dd=18&num_adults=1&num_children=0&num_rooms=1&bed_type=NP&num_beds=0&smoking_pref=NP¤cy_id=&name=the+bradford&brand=&priceband=

http://reservations.findlocalpages.com/nexres/search/power_results.cgi?ses=3a09c2f541 1574c6ecdf9ad260729e6414127&src=10004999&clear_cache=&city=dallas&state=TX &country=&zip=&avail=Y&doa_mm=09&doa_dd=13&dod_mm=09&dod_dd=14&num_ad

ults=1&num_children=0&num_rooms=1&bed_type=NP&num_beds=0&smoking_pref=NP¤cy_id=&name=the+bradford&brand=&priceband=

http://reservations.findlocalpages.com/nexres/search/power_results.cgi?ses=3a09c2f541 1574c6ecdf9ad260729e6414127&src=10004999&clear_cache=&city=dallas&state=&country=&zip=&avail=Y&doa_mm=09&doa_dd=17&dod_mm=09&dod_dd=18&num_adults =1&num_children=0&num_rooms=1&bed_type=NP&num_beds=0&smoking_pref=NP¤cy_id=&name=the+bradford&brand=&priceband=

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http://reservations.findlocalpages.com/nexres/search/power_results.cgi?src=10004999&lang=ITL&clear_cache=Y&city=dallas&state=TX&country=&zip=&avail=Y&doa_mm=09&doa_dd=17&dod_mm=09&dod_dd=18&num_adults=1&num_children=0&num_rooms=1&best ed_type=NP&num_beds=0&smoking_pref=NP¤cy_id=&name=the+bradford&brand=&priceband=

http://reservations.findlocalpages.com/nexres/search/power_results.cgi?src=10004999&clear_cache=Y&lang=DCH&city=dallas&state=TX (Partial URL)

http://reservations.findlocalpages.com/nexres/search/power_results.cgi?src=10004999&clear_cache=Y&lang=GER&city=dallas&state=TX (Partial URL)

http://reservations.findlocalpages.com/nexres/search/power_results.cgi?src=10004999&clear_cache=Y&lang=ITL&city=dallas&state=TX (Partial URL)

http://reservations.freehotelsearch.com/hotel/10005073-112419710.html?ses=bd86afbf6ac6ab6d8f427bbdef9ab82a37912

http://reservations.freehotelsearch.com/hotel/10005073-11241971O.html?ses=0a4328648030d1616b9481983d39e8d891427

http://reservations.freehotelsearch.com/hotel/10005073-11241971O.html?ses=d2cbfd001e1d110fbe60cf12976e5be934841

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helpline.com/servlet/reservations.CitywideAvailabilityXML?chainpref=&inmonth=9&country =US&es=&remote=hh&searchletter=B&outyear=2003&numadults=2&outday=6&masterc ode=hh&state=TX&smokingpref=&city=Dallas%20Ft%20Worth&outmonth=9&inyear=200 3&garea=Dallas%20Ft%20Worth&showNets=true&inday=5&bedpref=&numrooms=1&na mepref=

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rates.com/scripts/hotel.php?req=roomAvail&resType=hotel¤cyCode=USD&hoteIID =170890&hotelName=BRAD (2x) (Partial URL)

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http://secure2.hotelguidesales.com/travel/hotel/availability.rvlx?SESSID=e5e5d3cfcb0701ee18b3df19e91e45ad&name=The+Bradford+At+Lincoln+Park&hotel_latitude=32.8613&hotel_longitude=-96.7707&lat=328613&lng=-967707&id=113378&hotel_name=&hotel_address=&hotel_name=&hotel_country=&hotel

_state=&hotel_city=Dallas&ids=113378&use_first=1&checkin_month=9&checkin_day=8 &checkout_month=9&checkout_day=9&number_rooms=1&number_per_room=2 (2x)

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_room=2&hotel_rate=0&hotel_address=&hotel_city=Dallas&hotel_state=&hotel_country= &hotel_zipcode=&search_distance=20&hotel_chain=&hotel_name=&start=1&ids=11337 8&lat=328613&lng=-967707&hotel_latitude=32.8613&hotel_longitude=-96.7707&pid=SCB009&chain=VE&city=Dallas&city_code=Dallas&name=The+Bradford +At+Lincoln+Park

http://secure2.hotelguidesales.com/travel/hotel/availability.rvlx?SESSID=e122a2f25ace4c 460814d1c790aa53f4&name=The+Bradford+At+Lincoln+Park&hotel_latitude=32.8613& hotel_longitude=-96.7707&lat=328613&Ing=-967707&id=113378&hotel_name=&hotel_address=&hotel_name=&hotel_country=&hotel_state=&hotel_city=Dallas&ids=113378&use_first=1&checkin_month=9&checkin_day=9 &checkout_month=9&checkout_day=10&number_rooms=1&number_per_room=2

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http://travel.hotels-and-discounts.com/index.jsp?pageName=hotInfo&cid=59562&fc=list (2x)

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http://www.hotels-for-you.com/TX/TX_DALLAS_H/170890.htm (2x)

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engine.org/nexres/search/power_results.cgi?&=&avail=Y&bed_type=NP&brand=&city=&c lear_cache=0&country=¤cy_id=USD&doa_dd=12&doa_mm=09&dod_dd=13&dod_mm=09&footer=F-hse&header=H-

hse&lang=&name=bradford&num_adults=1&num_beds=0&num_children=0&num_rooms =1&priceband=&ses=b97821ce95266581e073827328740ab594550&smoking_pref=N P&src=10005534&src_aid=&state=&zip=&rows=21

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http://www.hotelus.com/travel/index.jsp?hotelID=170890&ccaa-hotel-reservations (2x)

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http://www.hotelus.com/es/travel/index.jsp?pageName=hotAvail&cid=47372&isHotels=tru e&isCondos=false&hotelID=170890&showPopUp=true (2x)

http://www.hotelus.com/es/travel/index.jsp?pageName=hotInfo&cid=47372&streetAddress =&city=Dallas&stateProvince=Tx&postalCode=75225&country=Us&numberOfAdults=2&numberOfChildren=0&numberOfRooms=1&mode=2&showPopUpMap=false&arrivalMonth =8&arrivalDay=29&departureMonth=9&departureDay=1&destinationID=9ec71f54-3dbc-4901-8c8a-9c9c85f5d42d&hoteIID=170890&hotelName=Bradford+At+Lincoln+Park

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http://www.hotelus.com/fr/travel/index.jsp?pageName=hotInfo&cid=47372&streetAddress=&city=Dallas&stateProvince=Tx&postalCode=75225&country=Us&numberOfAdults=2&numberOfChildren=0&numberOfRooms=1&mode=2&showPopUpMap=false&arrivalMonth=8&arrivalDay=29&departureMonth=9&departureDay=1&destinationID=9ec71f54-3dbc-4901-8c8a-9c9c85f5d42d&hotelID=170890&hotelName=Bradford+At+Lincoln+Park (2x)

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http://www.hotelus.com/de/travel/index.jsp?pageName=hotAvail&cid=47372&isHotels=truede&isCondos=false&hotelID=170890&showPopUp=true

http://www.hotelus.com/de/travel/index.jsp?pageName=hotInfo&cid=47372&streetAddress =&city=Dallas&stateProvince=Tx&postalCode=75225&country=Us&numberOfAdults=2&n umberOfChildren=0&numberOfRooms=1&mode=2&showPopUpMap=false&arrivalMonth =8&arrivalDay=29&departureMonth=9&departureDay=1&destinationID=9ec71f54-3dbc-4901-8c8a-9c9c85f5d42d&hoteIID=170890&hoteIName=Bradford+At+Lincoln+Park

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=10&departureDay=6&destinationID=9ec71f54-3dbc-4901-8c8a9c9c85f5d42d&hotelName=Bradford+Lincoln+Park
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